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March 5, 2025

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 3/6/2025

Hon. Gregory H. Woods
 United States District Court
 Southern District of New York
 500 Pearl Street, Room 12C
 New York, NY 10007-1312

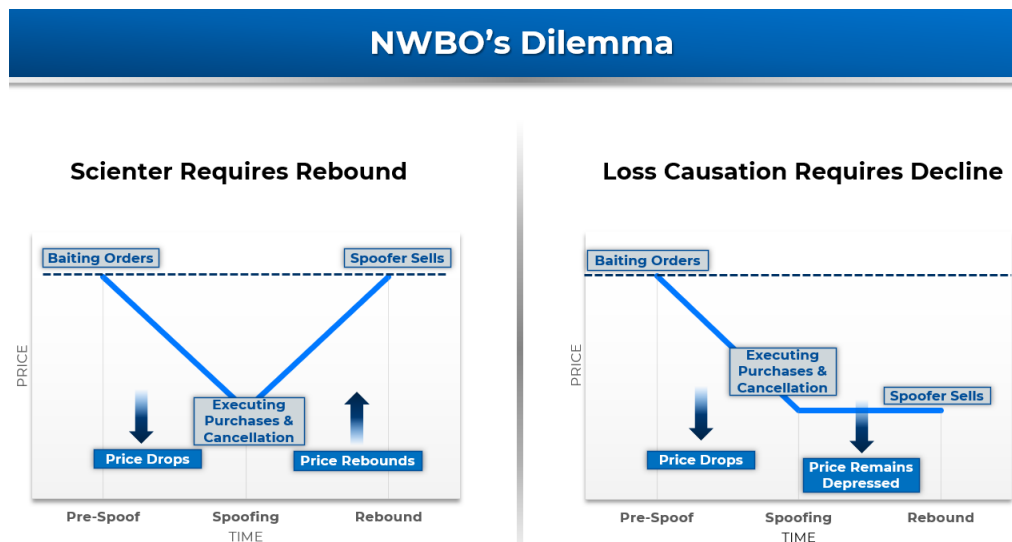
MEMORANDUM ENDORSED

Re: Northwest Biotherapeutics v. Canaccord Genuity, et al., No. 1:22-cv-10185-GHW-GS

Dear Judge Woods:

We represent Defendant Citadel Securities LLC in the above-captioned action and respectfully submit this letter motion on behalf of all Defendants to request oral argument on Defendants' Objections to Report & Recommendation. *See* ECF No. 177.

As explained in the papers previously submitted (Dkts. No. 177, 184), allegations of "spoofing" in high-frequency trading can appear complex. The application of such allegations to federal pleading standards should not be. Plaintiff implausibly asks the Court to accept contradictory economic worlds for purposes of pleading scienter and loss causation:



We believe oral argument will help the Court's consideration of this important issue. Thank you for your consideration of this request.

Hon. Gregory H. Woods

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March 5, 2025

Plaintiff Northwest Biotherapeutics (“NWBO”) takes no position on Defendants’ request for oral argument on the parties’ Objections.¹

Respectfully,

/s/ Jonathan K. Youngwood
Jonathan K. Youngwood

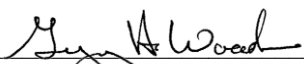
cc: All Counsel of Record (via ECF)

Application denied without prejudice. The Court has received Defendants’ request for oral argument and will take Defendants’ request under advisement. The Court declines to order oral argument at this time.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 186.

SO ORDERED.

Dated: March 6 2025
New York, New York



GREGORY H. WOODS
United States District Judge

¹ NWBO requested that we inform the Court that it notes “[I]n connection with Defendants’ attempt to dismiss its claims, there have now been 20 briefs and supplemental letters filed, a lengthy oral argument before Magistrate Stein, two R&Rs totaling 136 pages issued, and an opinion by this Court overruling the parties’ initial objections and adopting the first R&R in full. As such, the Court is well versed in the facts and law, and has sufficient information in front of it to rule on the current R&R without further burdening the Court.” Defendants believe that the forest may have been lost for the trees given this volume of briefing, and that oral argument will help simplify the pleading dispute for the Court’s consideration.